

# **EXHIBIT 52**

1 Michael C. Murphy, Esq. (S.B. No. 104872)  
Michael@murphlaw.net  
2 Michael C. Murphy, Jr. Esq. (S.B. No. 305896)  
Michael.jr@murphlaw.net  
3 LAW OFFICES OF MICHAEL C. MURPHY  
2625 Townsgate Road, Suite 330  
4 Westlake Village, CA 91361  
Tel.: (818) 558-3718  
5 Fax: (805) 367-4506

6 Attorneys for Defendant,  
Patrick M. Byrne

7  
8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA

10 ROBERT HUNTER BIDEN,

11  
12 Plaintiff,

13  
14 vs.

15 PATRICK M. BYRNE,  
16 Defendant.

Case No.: 2:23-cv-09430-SVW-PD  
Judge: Honorable Stephen V. Wilson  
Courtroom: 10A

17 DEFENDANT PATRICK M.  
18 BYRNE'S FURTHER RESPONSES  
19 TO REQUESTS FOR  
20 PRODUCTION, SET ONE, TO  
21 PLAINTIFF ROBERT HUNTER  
22 BIDEN

23 Complaint Filed: November 8, 2023  
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27  
28

1 **PROPOUNDING PARTY:** Plaintiff, ROBERT HUNTER BIDEN

2 **RESPONDING PARTY:** Defendant, PATRICK M. BYRNE

3 **SET NO.:** Set One (1)

4 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

5 Defendant Patrick M. Byrne ("Responding Party") hereby responds to the  
6 Requests for Production, Set One, propounded by Plaintiff Robert Hunter Biden  
7 ("Propounding Party") as follows:

8 **PRELIMINARY STATEMENT**

9 1. It is to be noted that this Responding Party has not fully completed  
10 investigation of the facts, discovery, and preparation for the trial of this case. The  
11 following responses are based only on such information and documents which are  
12 presently available to and specifically known to this responding party and discloses  
13 only those contentions presently known to the responding party. It is anticipated  
14 that further discovery, independent investigation, legal research, and analysis will  
15 supply additional facts, add meaning to the known facts, as well as establish  
16 entirely new factual conclusions and legal contentions. This discovery,  
17 independent investigation, legal research, and analysis may lead to additions,  
18 changes and/or variations from the contentions set forth herein.

19 2. The following responses are given without prejudice to the  
20 Responding Party's right to produce any subsequently discovered evidence which  
21 this Responding Party may later recall. The Responding Party reserves the right to  
22 change any and all of the following responses as additional facts are ascertained,  
23 legal research is completed and analysis and contentions are made. The following  
24 responses are made in good faith to supply factual information and as much  
25 specification of legal contentions as are presently known, but shall in no way  
26 prejudice the responding party in relation to further discovery, research or analysis.

27 3. Notwithstanding any objection to a request to produce including one  
28 based upon privilege set forth in the following responses, Responding party has not



1 withheld any responsive information or documents upon the basis of any such  
2 objections including any asserted privilege at this time. Accordingly, no FRCP  
3 Rule 26 privilege log is necessary at this time.

4 **GENERAL OBJECTIONS**

5 1. The objections below are incorporated into the Responding Party's  
6 responses, whether or not specific reference is made to such objection in the  
7 response to a particular request.

8 2. This answering party objects generally to each request to the extent it  
9 seeks the disclosure of information protected by the attorney-client privilege.

10 3. This answering party objects generally to each request to the extent it  
11 seeks disclosure of information protected by the attorney-work product doctrine.

12 4. This answering party objects generally to each of the "Definitions"  
13 contained in Requests for Production, Set One on the grounds that such  
14 "Definitions" are vague, ambiguous, overbroad, compound, unduly burdensome,  
15 assumes facts not in evidence and denied, oppressive, and if interpreted literally,  
16 impossible to answer and Plaintiff is using said "Definitions" to try and evade in  
17 bad faith the obligation of Plaintiff to describe by category and with reasonable  
18 particularity the documents that Plaintiff is seeking and as required pursuant to the  
19 provisions of Federal Rule of Civil Procedure §34(b)(1)(A) and will not use them  
20 to respond to these requests to produce.

21 5. This answering party objects generally to each of the "Instructions"  
22 contained in Special Interrogatories, Set One on the grounds that such  
23 "Instructions" are vague, ambiguous, overbroad, compound, unduly burdensome,  
24 assumes facts not in evidence and denied, and oppressive, and if interpreted  
25 literally, impossible to comply with and Plaintiff is using the "Instructions" to try  
26 and evade in bad faith the faith the obligation of Plaintiff to describe by category  
27 and with reasonable particularity the documents that Plaintiff is seeking and as  
28 required pursuant to the provisions of Federal Rule of Civil Procedure



§34(b)(1)(A) and will not use them to respond to these requests to produce.

6. This answering party objects generally to each request as vague and ambiguous to the extent it implies terms that this answering party cannot interpret while understood in the context of these requests or this litigation. Where possible, this answering party has made reasonable assumptions as to the Propounding Party's intended meaning and has responded accordingly, while preserving the objection as to the vagueness and ambiguity.

7. Without waiving said objections, Responding Party states as follows:

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### **REQUESTS**

#### **REQUEST FOR PRODUCTION NO. 1:**

All Documents or Communications between You and any Person Regarding Robert Hunter Biden, including without limitation, any letters, text messages, notes from telephone or in-person conversations, e-mail, social media posts/messages, or other correspondence.

#### **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

Objection. This interrogatory improperly seeks to have the Defendant disclose the identity of covert agents of the United States government and engage in criminal conduct by making such disclosure in violation of the provisions of 50 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the Defendant disclose classified information of the United States government and engage in criminal conduct by making such disclosure in violation of the provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to require Defendant to disclose confidential sources that are subject to the journalist privilege that is applicable to Defendant as a journalist in this case. Without waiving said objection, this Defendant responds to this request as follows:

Defendant is unable to produce the requested documents because they do not exist and never existed.

**REQUEST FOR PRODUCTION NO. 2:**

All Documents and Communications with retired U.S. Army lieutenant general Michael Flynn concerning Robert Hunter Biden or the "Capitol Times Magazine" article referenced in the Complaint, including without limitation, any letters, text messages, notes from telephone or in-person conversations, e-mail, social media posts/messages, or other correspondence.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

Objection. This interrogatory improperly seeks to have the Defendant disclose the identity of covert agents of the United States government and engage in criminal conduct by making such disclosure in violation of the provisions of 50 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the Defendant disclose classified information of the United States government and engage in criminal conduct by making such disclosure in violation of the provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to require Defendant to disclose confidential sources that are subject to the journalist privilege that is applicable to Defendant as a journalist in this case. Without waiving said objection, this Defendant responds to this request as follows:

Defendant is unable to produce the requested documents because they do not exist and never existed.

**REQUEST FOR PRODUCTION NO. 3:**

Documents sufficient to show each Person responsible for creating, investigating, researching, drafting, editing, and approving content published in the "Capitol Times Magazine."

**RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

Defendant is unable to produce the requested documents because they are not in his possession, custody and/or control. Anil Anwar of Capitol Times Magazine may have the requested documents in his possession, custody and/or control.



**REQUEST FOR PRODUCTION NO. 4:**

All Communications between You and Persons responsible for creating, investigating, researching, drafting, editing, and approving content in the "Capitol Times Magazine" regarding the Publication.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

Defendant is unable to produce the requested documents because they are not in his possession, custody and/or control. Anil Anwar of Capitol Times Magazine may have the requested documents in his possession, custody and/or control.

**REQUEST FOR PRODUCTION NO. 5:**

All Documents and Communications Concerning Your control over, governance of, or participation in publishing decisions over the "Capitol Times Magazine" Publication.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

Defendant is unable to produce the requested documents because they do not exist and never existed.

**REQUEST FOR PRODUCTION NO. 6:**

All Documents or Communications that You contend support, establish or demonstrate that the allegations You have made in the "Capitol Times Magazine" concerning Plaintiff are substantially true, accurate, not misleading, and/or not defamatory.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

Objection. This interrogatory improperly seeks to have the Defendant disclose the identity of covert agents of the United States government and engage in criminal conduct by making such disclosure in violation of the provisions of 50 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the Defendant disclose classified information of the United States government and engage in criminal conduct by making such disclosure in violation of the



1 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
2 require Defendant to disclose confidential sources that are subject to the journalist  
3 privilege that is applicable to Defendant as a journalist in this case. Without  
4 waiving said objection, this Defendant responds to this request as follows:

5 Defendant has and will produce the Affidavit of Mr. John Moynihan. The  
6 Defendant has and will produce three tape recordings. The Defendant has no other  
7 documents in his possession, custody or control that should be produced in  
8 response to this request to produce and no such documents exist or ever existed.

9 **REQUEST FOR PRODUCTION NO. 7:**

10 All Documents or Communications that You contend support, establish or  
11 demonstrate that the Defamatory Statements You have made against Plaintiff are  
12 substantially true, accurate, not misleading, and/or not defamatory.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

14 Defendant is unable to produce the requested documents because they do not  
15 exist and never existed.

16 **REQUEST FOR PRODUCTION NO. 8:**

17 All Documents and Communications Concerning evidence or lack thereof  
18 supporting the statement in the Publication that "in November 2021, I went back to  
19 the Middle East."

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

21 Defendant shall produce all documents requested that are in his possession,  
22 custody and/or control.

23 **REQUEST FOR PRODUCTION NO. 9:**

24 All Documents and Communications Concerning evidence or lack thereof  
25 supporting the statement in the Publication that in November 2021 while in the  
26 Middle East You "met with a group including a special Iranian figure, an old friend  
27 who let me know a World War was coming, and had a proposal to avert it. I told  
28 them I would relay the proposal but I did not think it would fly."

**RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

Objection. This interrogatory improperly seeks to have the Defendant disclose the identity of covert agents of the United States government and engage in criminal conduct by making such disclosure in violation of the provisions of 50 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the Defendant disclose classified information of the United States government and engage in criminal conduct by making such disclosure in violation of the provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to require Defendant to disclose confidential sources that are subject to the journalist privilege that is applicable to Defendant as a journalist in this case. Without waiving said objection, this Defendant responds to this request as follows:

Defendant has and shall produce the Affidavit of Mr. John Moynihan. The Defendant has and shall produce three voice recordings. The Defendant has no other documents in his possession, custody or control that should be produced in response to this request to produce and no such documents exist or ever existed.

**REQUEST FOR PRODUCTION NO. 10:**

All Documents and Communications Concerning evidence or lack thereof supporting the statement in the Publication that You became aware that "Hunter Biden was reaching out to the Iranian government in the fall of 2021 with the following offer: *You Iranians have \$8 billion frozen in a bank account in South Korea. My father will unfreeze it in return for \$800 million being funneled into a numbered account for us. And if you do this deal with us, it will lubricate other negotiations which have recently started between us.* By that, the Iranians believed that Hunter meant the JCPOA talks, which had restarted in Geneva a month or two previously." (emphasis in original).

**RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

Objection. This interrogatory improperly seeks to have the Defendant disclose the identity of covert agents of the United States government and engage



1 in criminal conduct by making such disclosure in violation of the provisions of 50  
2 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the  
3 Defendant disclose classified information of the United States government and  
4 engage in criminal conduct by making such disclosure in violation of the  
5 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
6 require Defendant to disclose confidential sources that are subject to the journalist  
7 privilege that is applicable to Defendant as a journalist in this case. Without  
8 waiving said objection, this Defendant responds to this request as follows:

9 Defendant has and will produce the Affidavit of Mr. John Moynihan. The  
10 Defendant has and shall produce three voice recordings. The Defendant has no  
11 other documents in his possession, custody or control that should be produced in  
12 response to this request to produce and no such documents exist or ever existed.

13 **REQUEST FOR PRODUCTION NO. 11:**

14 All Documents and Communications Concerning evidence or lack thereof  
15 supporting the statement in the Publication that in November 2021 while in the  
16 Middle East You became aware that Plaintiff was offering the "Iranians" "[p]ay us  
17 \$100 million and we let you keep 10 nukes, \$200 million for 20 nukes."

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

19 Objection. This interrogatory improperly seeks to have the Defendant  
20 disclose the identity of covert agents of the United States government and engage  
21 in criminal conduct by making such disclosure in violation of the provisions of 50  
22 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the  
23 Defendant disclose classified information of the United States government and  
24 engage in criminal conduct by making such disclosure in violation of the  
25 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
26 require Defendant to disclose confidential sources that are subject to the journalist  
27 privilege that is applicable to Defendant as a journalist in this case. Without  
28 waiving said objection, this Defendant responds to this request as follows:



1 Defendant has and will produce the Affidavit of Mr. John Moynihan. The  
2 Defendant has and will produce three voice recordings. The Defendant has no  
3 other documents in his possession, custody or control that should be produced in  
4 response to this request to produce and no such documents exist or ever existed.

5 **REQUEST FOR PRODUCTION NO. 12:**

6 All Documents and Communications Concerning evidence or lack thereof  
7 supporting the statement in the Publication that in November 2021 while in the  
8 Middle East You learned that "Hunter was doing this through a middleman, the son  
9 of the Minister of Defense of Pakistan."

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

11 Objection. This interrogatory improperly seeks to have the Defendant  
12 disclose the identity of covert agents of the United States government and engage  
13 in criminal conduct by making such disclosure in violation of the provisions of 50  
14 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the  
15 Defendant disclose classified information of the United States government and  
16 engage in criminal conduct by making such disclosure in violation of the  
17 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
18 require Defendant to disclose confidential sources that are subject to the journalist  
19 privilege that is applicable to Defendant as a journalist in this case. Without  
20 waiving said objection, this Defendant responds to this request as follows:

21 Defendant has and will produce the Affidavit of Mr. John Moynihan. The  
22 defendant also produces three recordings of voicemails. The Defendant has no  
23 other documents in his possession, custody or control that should be produced in  
24 response to this request to produce and no such documents exist or ever existed.

25 **REQUEST FOR PRODUCTION NO. 13:**

26 All Documents and Communications Concerning evidence or lack thereof  
27 supporting the statement in the Publication that in November 2021 while in the  
28 Middle East You learned that the son of the Minister of Defense of Pakistan "was

1 meeting with Hunter, then relaying messages to someone in Iran. And he was  
2 being reckless enough to leave voicemails in Iran about it."

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

4 Objection. This interrogatory improperly seeks to have the Defendant  
5 disclose the identity of covert agents of the United States government and engage  
6 in criminal conduct by making such disclosure in violation of the provisions of 50  
7 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the  
8 Defendant disclose classified information of the United States government and  
9 engage in criminal conduct by making such disclosure in violation of the  
10 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
11 require Defendant to disclose confidential sources that are subject to the journalist  
12 privilege that is applicable to Defendant as a journalist in this case. Without  
13 waiving said objection, this Defendant responds to this request as follows:

14 Defendant has and will produce the Affidavit of Mr. John Moynihan. The  
15 three voicemail recordings were produced. The Defendant has no other documents  
16 in his possession, custody or control that should be produced in response to this  
17 request to produce and no such documents exist or ever existed.

18 **REQUEST FOR PRODUCTION NO. 14:**

19 All Documents and Communications Concerning evidence or lack thereof  
20 supporting the statement in the Publication that when You returned from the  
21 Middle East in November 2021 You learned that "the agencies went to work over  
22 the weekend and were "told a week later that they had confirmed it all" regarding  
23 the allegations in the Defamatory Statements.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

25 Objection. This interrogatory improperly seeks to have the Defendant  
26 disclose the identity of covert agents of the United States government and engage  
27 in criminal conduct by making such disclosure in violation of the provisions of 50  
28 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the



1 Defendant disclose classified information of the United States government and  
2 engage in criminal conduct by making such disclosure in violation of the  
3 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
4 require Defendant to disclose confidential sources that are subject to the journalist  
5 privilege that is applicable to Defendant as a journalist in this case. Without  
6 waiving said objection, this Defendant responds to this request as follows:

7 Defendant is unable to produce any of the requested documents because they  
8 do not exist and never existed.

9 **REQUEST FOR PRODUCTION NO. 15:**

10 All Documents and Communications Concerning evidence or lack thereof  
11 supporting the statement in the Publication that when You returned from the  
12 Middle East in November 2021 You received confirmation that "[t]he voice on the  
13 voicemail that [you] had acquired was voice-matched to the son of the Minister of  
14 Defense of Pakistan, who had a connection to Hunter Biden."

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

16 Objection. This interrogatory improperly seeks to have the Defendant  
17 disclose the identity of covert agents of the United States government and engage  
18 in criminal conduct by making such disclosure in violation of the provisions of 50  
19 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the  
20 Defendant disclose classified information of the United States government and  
21 engage in criminal conduct by making such disclosure in violation of the  
22 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
23 require Defendant to disclose confidential sources that are subject to the journalist  
24 privilege that is applicable to Defendant as a journalist in this case. Without  
25 waiving said objection, this Defendant responds to this request as follows:

26 Defendant has and will produce the Affidavit of Mr. John Moynihan. The  
27 three voicemail recordings were produced. The Defendant has no other documents  
28 in his possession, custody or control that should be produced in response to this



1 request to produce and no such documents exist or ever existed.

2 **REQUEST FOR PRODUCTION NO. 16:**

3 All Documents and Communications Concerning evidence or lack thereof  
4 supporting the statement in the Publication that in December 2021 You were "told  
5 that the scheme was confirmed across the agencies."

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

7 Objection. This interrogatory improperly seeks to have the Defendant  
8 disclose the identity of covert agents of the United States government and engage  
9 in criminal conduct by making such disclosure in violation of the provisions of 50  
10 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the  
11 Defendant disclose classified information of the United States government and  
12 engage in criminal conduct by making such disclosure in violation of the  
13 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
14 require Defendant to disclose confidential sources that are subject to the journalist  
15 privilege that is applicable to Defendant as a journalist in this case. Without  
16 waiving said objection, this Defendant responds to this request as follows:

17 Defendant has and will produce the Affidavit of Mr. John Moynihan.  
18 Defendant has and will produce three voice recordings The Defendant has no other  
19 documents in his possession, custody or control that should be produced in  
20 response to this request to produce and no such documents exist or ever existed.

21 **REQUEST FOR PRODUCTION NO. 17:**

22 All Documents and Communications Concerning evidence or lack thereof  
23 supporting the statement in the Publication that "the Biden Family was seeking a  
24 bribe from Iran to release funds frozen in South Korea, and to go easy in nuclear  
25 talks, and that the United States Government has been aware of this since  
26 December, 2021 " which You agreed was "100% correct."

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**RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

Objection. This interrogatory improperly seeks to have the Defendant disclose the identity of covert agents of the United States government and engage in criminal conduct by making such disclosure in violation of the provisions of 50 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the Defendant disclose classified information of the United States government and engage in criminal conduct by making such disclosure in violation of the provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to require Defendant to disclose confidential sources that are subject to the journalist privilege that is applicable to Defendant as a journalist in this case. Without waiving said objection, this Defendant responds to this request as follows:

Defendant has and will produce the Affidavit of Mr. John Moynihan. The Defendant has and will produce three voicemail recordings were produced. The Defendant has no other documents in his possession, custody or control that should be produced in response to this request to produce and no such documents exist or ever existed.

**REQUEST FOR PRODUCTION NO. 18:**

All Documents and Communications Concerning evidence or lack thereof supporting Your statement in an interview on May 10, 2023, that in November 2021 Plaintiff "was reaching out back-channel to the Iranian government with this proposal: 'You Iranians have \$8 billion frozen in a South Korean bank, my father will sign to unfreeze it in return for \$800 million funneled into a numbered account for us and if you will do this it will lubricate the other discussions which have recently started between us,' by which, since this conversation was late November 2021, the Iranians took to mean the recently started nuclear negotiations. The Bidens were holding up their hand and saying you pay us this you can keep 10 nukes, you pay us this you can keep 20 nukes, they were offering that kind of a deal."



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2 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

3 Objection. This interrogatory improperly seeks to have the Defendant  
4 disclose the identity of covert agents of the United States government and engage  
5 in criminal conduct by making such disclosure in violation of the provisions of 50  
6 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the  
7 Defendant disclose classified information of the United States government and  
8 engage in criminal conduct by making such disclosure in violation of the  
9 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
10 require Defendant to disclose confidential sources that are subject to the journalist  
11 privilege that is applicable to Defendant as a journalist in this case. Without  
12 waiving said objection, this Defendant responds to this request as follows:

13 Defendant has and will produce the Affidavit of Mr. John Moynihan. The  
14 Defendant has and will produce three voicemail recordings were produced. The  
15 Defendant has no other documents in his possession, custody or control that should  
16 be produced in response to this request to produce and no such documents exist or  
17 ever existed.

18 **REQUEST FOR PRODUCTION NO. 19:**

19 All Documents and Communications Concerning evidence or lack thereof to  
20 support the following statement you made in an interview on May 11, 2023: "I met  
21 an old friend ... I don't want to name names ... I became aware of something that  
22 had happened-that Hunter Biden was reaching out to [Iran] back channel and there  
23 are actually some voicemails that confirmed everything I am telling you ... an  
24 interagency group centered in the FBI ... was able to confirm 100% everything I've  
25 told you.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

27 Objection. This interrogatory improperly seeks to have the Defendant  
28 disclose the identity of covert agents of the United States government and engage



1 in criminal conduct by making such disclosure in violation of the provisions of 50  
2 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the  
3 Defendant disclose classified information of the United States government and  
4 engage in criminal conduct by making such disclosure in violation of the  
5 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
6 require Defendant to disclose confidential sources that are subject to the journalist  
7 privilege that is applicable to Defendant as a journalist in this case. Without  
8 waiving said objection, this Defendant responds to this request as follows:

9 Defendant has and will produce the Affidavit of Mr. John Moynihan. The  
10 Defendant has and will produce three voicemail recordings. The Defendant has no  
11 other documents in his possession, custody or control that should be produced in  
12 response to this request to produce and no such documents exist or ever existed.

13 **REQUEST FOR PRODUCTION NO. 20:**

14 All Documents and Communications Concerning evidence or lack thereof  
15 that You stole the evidence of the allegations You have made against Plaintiff in  
16 the Defamatory Statements from someone in Iran.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

18 Objection. This interrogatory improperly seeks to have the Defendant  
19 disclose the identity of covert agents of the United States government and engage  
20 in criminal conduct by making such disclosure in violation of the provisions of 50  
21 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the  
22 Defendant disclose classified information of the United States government and  
23 engage in criminal conduct by making such disclosure in violation of the  
24 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
25 require Defendant to disclose confidential sources that are subject to the journalist  
26 privilege that is applicable to Defendant as a journalist in this case. Without  
27 waiving said objection, this Defendant responds to this request as follows:

28 Defendant is unable to produce any of the requested documents because they

1 do not exist and never existed.

2 **REQUEST FOR PRODUCTION NO. 21:**

3 All Documents and Communications Concerning evidence or lack thereof  
4 that the allegations You made against Plaintiff in the Defamatory Statements have  
5 been verified as true by others.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

7 Objection. This interrogatory improperly seeks to have the Defendant  
8 disclose the identity of covert agents of the United States government and engage  
9 in criminal conduct by making such disclosure in violation of the provisions of 50  
10 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the  
11 Defendant disclose classified information of the United States government and  
12 engage in criminal conduct by making such disclosure in violation of the  
13 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
14 require Defendant to disclose confidential sources that are subject to the journalist  
15 privilege that is applicable to Defendant as a journalist in this case. Without  
16 waiving said objection, this Defendant responds to this request as follows:

17 Defendant is unable to produce any of the requested documents because they  
18 do not exist and never existed.

19 **REQUEST FOR PRODUCTION NO. 22:**

20 All Documents and Communications Concerning evidence or lack thereof  
21 that the evidence of the allegations You have made against Plaintiff in the  
22 Defamatory Statements were "so politically radioactive" that FBI Director  
23 Christopher Wray had to "disband" an "interagency group because it had reached  
24 the core of government corruption" and that you "had brought them four massive  
25 loads [ of evidence], including that Hunter Biden and Joe Biden are selling out the  
26 country to Iran."

27 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

28 Objection. This interrogatory improperly seeks to have the Defendant



1 disclose the identity of covert agents of the United States government and engage  
2 in criminal conduct by making such disclosure in violation of the provisions of 50  
3 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the  
4 Defendant disclose classified information of the United States government and  
5 engage in criminal conduct by making such disclosure in violation of the  
6 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
7 require Defendant to disclose confidential sources that are subject to the journalist  
8 privilege that is applicable to Defendant as a journalist in this case. Without  
9 waiving said objection, this Defendant responds to this request as follows:

10 Defendant has and will produce the Affidavit of Mr. John Moynihan. The  
11 Defendant has and will produce three voicemail recordings. The Defendant has no  
12 other documents in his possession, custody or control that should be produced in  
13 response to this request to produce and no such documents exist or ever existed.

14 **REQUEST FOR PRODUCTION NO. 23:**

15 All Documents and Communications Concerning evidence or lack thereof  
16 that You have participated in clandestine operations for the United States  
17 Government.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 23:**

19 Objection. This interrogatory improperly seeks to have the Defendant  
20 disclose the identity of covert agents of the United States government and engage  
21 in criminal conduct by making such disclosure in violation of the provisions of 50  
22 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the  
23 Defendant disclose classified information of the United States government and  
24 engage in criminal conduct by making such disclosure in violation of the  
25 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
26 require Defendant to disclose confidential sources that are subject to the journalist  
27 privilege that is applicable to Defendant as a journalist in this case. Without  
28 waiving said objection, this Defendant responds to this request as follows:

1 Defendant has and will produce the Affidavit of Mr. John Moynihan. The  
2 Defendant has and will produce three voicemail recordings. The Defendant has no  
3 other documents in his possession, custody or control that should be produced in  
4 response to this request to produce and no such documents exist or ever existed.

5 **REQUEST FOR PRODUCTION NO. 24:**

6 All Documents and Communications Concerning evidence or lack thereof  
7 that You have participated in what You describe as "Operation Snow Globe."

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

9 Objection. This interrogatory improperly seeks to have the Defendant  
10 disclose the identity of covert agents of the United States government and engage  
11 in criminal conduct by making such disclosure in violation of the provisions of 50  
12 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the  
13 Defendant disclose classified information of the United States government and  
14 engage in criminal conduct by making such disclosure in violation of the  
15 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
16 require Defendant to disclose confidential sources that are subject to the journalist  
17 privilege that is applicable to Defendant as a journalist in this case. Without  
18 waiving said objection, this Defendant responds to this request as follows:

19 Defendant does not have in his possession, custody and/or control any of the  
20 requested documents.

21 **REQUEST FOR PRODUCTION NO. 25:**

22 All Documents and Communications Concerning evidence or lack thereof  
23 that You have participated in helping to restore "peaceful relations" in Vietnam in  
24 1994.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 25:**

26 Objection. This interrogatory improperly seeks to have the Defendant  
27 disclose the identity of covert agents of the United States government and engage  
28 in criminal conduct by making such disclosure in violation of the provisions of 50



1 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the  
2 Defendant disclose classified information of the United States government and  
3 engage in criminal conduct by making such disclosure in violation of the  
4 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
5 require Defendant to disclose confidential sources that are subject to the journalist  
6 privilege that is applicable to Defendant as a journalist in this case. Without  
7 waiving said objection, this Defendant responds to this request as follows:

8 Defendant is unable to produce any of the requested documents because they  
9 are not in his possession, custody or control.

10 **REQUEST FOR PRODUCTION NO. 26:**

11 All Documents and Communications Concerning evidence or lack thereof  
12 that You have participated in helping to prevent a war with Iran in 2006.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 26:**

14 Objection. This interrogatory improperly seeks to have the Defendant  
15 disclose the identity of covert agents of the United States government and engage  
16 in criminal conduct by making such disclosure in violation of the provisions of 50  
17 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the  
18 Defendant disclose classified information of the United States government and  
19 engage in criminal conduct by making such disclosure in violation of the  
20 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
21 require Defendant to disclose confidential sources that are subject to the journalist  
22 privilege that is applicable to Defendant as a journalist in this case. Without  
23 waiving said objection, this Defendant responds to this request as follows:

24 Defendant is unable to produce the requested documents because they are  
25 not in his possession, custody and/or control.

26 **REQUEST FOR PRODUCTION NO. 27:**

27 All Documents and Communications Concerning evidence or lack thereof  
28 that You have participated in assessing the "computer science capabilities" of

Venezuela in 2018.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 27:**

Objection. This interrogatory improperly seeks to have the Defendant disclose the identity of covert agents of the United States government and engage in criminal conduct by making such disclosure in violation of the provisions of 50 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the Defendant disclose classified information of the United States government and engage in criminal conduct by making such disclosure in violation of the provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to require Defendant to disclose confidential sources that are subject to the journalist privilege that is applicable to Defendant as a journalist in this case. Without waiving said objection, this Defendant responds to this request as follows:

Defendant is unable to produce the requested documents because they are not in his possession, custody and/or control.

**REQUEST FOR PRODUCTION NO. 28:**

All Documents and Communications Concerning evidence or lack thereof that You entered into an intimate relationship with 26 year-old Maria Butina as a means to help the FBI gather "intel" on Russia.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 28:**

Objection. This interrogatory improperly seeks to have the Defendant disclose the identity of covert agents of the United States government and engage in criminal conduct by making such disclosure in violation of the provisions of 50 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the Defendant disclose classified information of the United States government and engage in criminal conduct by making such disclosure in violation of the provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to require Defendant to disclose confidential sources that are subject to the journalist privilege that is applicable to Defendant as a journalist in this case. Without



1 waiving said objection, this Defendant responds to this request as follows:

2 Defendant has and will produce a photograph taken of Maria Butina that are  
3 relevant to the request to produce. Defendant does not have in his possession,  
4 custody or control any other documents being sought in this request to produce.

5 **REQUEST FOR PRODUCTION NO. 29:**

6 All Documents and Communications Concerning evidence or lack thereof  
7 that members of the United States Government, including but not limited to James  
8 Corney and Barack Obama, have requested your assistance on any matters.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

10 Objection. This interrogatory improperly seeks to have the Defendant  
11 disclose the identity of covert agents of the United States government and engage  
12 in criminal conduct by making such disclosure in violation of the provisions of 50  
13 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the  
14 Defendant disclose classified information of the United States government and  
15 engage in criminal conduct by making such disclosure in violation of the  
16 provisions of 18 U.S.C. §798(a), (b) and (c). This interrogatory improperly seeks to  
17 require Defendant to disclose confidential sources that are subject to the journalist  
18 privilege that is applicable to Defendant as a journalist in this case.

19 Defendant is unable to produce the requested documents because they are  
20 not in his possession, custody and/or control.

21 **REQUEST FOR PRODUCTION NO. 30:**

22 All Documents Related to the statistics of view counts of the Twitter posts  
23 You made with the Defamatory Statements including the number of views,  
24 location of viewers, and any other data available to You.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 30:**

26 This Defendant is unable to produce any of the requested documents because  
27 they are not in his possession, custody or control.

28 ///

**REQUEST FOR PRODUCTION NO. 31:**

All Documents Related to the statistics of view counts and downloads of the "Capitol Times Magazine" Publication including the number of views, location of viewers, and any other data available to You.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 31:**

This Defendant is unable to produce the requested documents because they are not in his possession, custody, and control. Anil Amwar of Capital Times Magazine may have the requested documents.

**REQUEST FOR PRODUCTION NO. 32:**

All Documents relied upon by You in preparing Your Answer.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 32:**

The defendant did not rely on any documents in preparing his Answer.

**REQUEST FOR PRODUCTION NO. 33:**

All Documents on which you intend to rely at any hearing or trial of this Action.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 33:**

Objection. This request seeks to improperly invade the attorney-client and attorney-work product privileges that he has with his counsel. Defendant does not have any requested documents in his possession, custody or control because neither he nor his counsel have made any determination of which documents he intends to use during the trial of this case.

**REQUEST FOR PRODUCTION NO. 34:**

All Documents identified in or Relating to Your responses to Defendant's First Set of Interrogatories.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 34:**

Defendant shall produce and has produced all requested documents in his possession, custody and/or control.

**REQUEST FOR PRODUCTION NO. 35:**



1 If You contend that the Defamatory Statements are true, all Documents that  
2 support YOUR contention.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 35:**

4 Defendant shall produce and has produced all requested documents in his  
5 possession, custody/ and/or control.

6 **REQUEST FOR PRODUCTION NO. 36:**

7 All Documents concerning or evidencing any Communications between You  
8 and Qasem Soleimani.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 36:**

10 Defendant is unable to produce any of the requested documents because they  
11 do not exist and never existed.

12 **REQUEST FOR PRODUCTION NO. 37:**

13 All Documents supporting the First Affirmative Defense in Your Answer.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 37:**

15 Defendant shall produce all requested documents in his possession, custody  
16 and/or control.

17 **REQUEST FOR PRODUCTION NO. 38:**

18 All Documents supporting the Second Affirmative Defense in Your Answer.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 38:**

20 Defendant shall produce all requested documents in his possession, custody  
21 and/or control.

22 **REQUEST FOR PRODUCTION NO. 39:**

23 All Documents supporting the Third Affirmative Defense in Your Answer.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 39:**

25 Defendant shall produce all requested documents in his possession, custody  
26 and/or control.

27 **REQUEST FOR PRODUCTION NO. 40:**

28 All Documents supporting the Fourth Affirmative Defense in Your Answer.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 40:**

Defendant shall produce all requested documents in his possession, custody and/or control.

**REQUEST FOR PRODUCTION NO. 41:**

All Documents supporting the Fifth Affirmative Defense in Your Answer.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 41:**

Defendant shall produce all requested documents in his possession, custody and/or control.

**REQUEST FOR PRODUCTION NO. 42:**

All Documents supporting the Sixth Affirmative Defense in Your Answer.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 42:**

Defendant shall produce all requested documents in his possession, custody and/or control.

**REQUEST FOR PRODUCTION NO. 43:**

All Documents supporting the Seventh Affirmative Defense in Your Answer.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 43:**

Defendant shall produce all requested documents in his possession, custody and/or control.

**REQUEST FOR PRODUCTION NO. 44:**

All Documents supporting the Eighth Affirmative Defense in Your Answer.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 44:**

Defendant shall produce all requested documents in his possession, custody and/or control.

**REQUEST FOR PRODUCTION NO. 45:**

All Communications between You and The America Project.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 45:**

Objection. This request seeks the production of documents that are irrelevant



1 to the subject matter of this action and that are not designed to lead to the  
2 discovery of admissible evidence. However, without waiving said objection, this  
3 Defendant does not have in his possession, custody or control any documents that  
4 relate to this case.

5 **REQUEST FOR PRODUCTION NO. 46:**

6 All Documents relating to sales of the Publication, including documents  
7 reflecting the number of copies of the Publication that were sold, the total revenue  
8 generated from sales of the Publication, and all revenues You received from sales  
9 of the Publication.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 46:**

11 Defendant is unable to produce the requested documents because they are  
12 not in his possession, custody and/or his control. Anil Anwar of Capital Times  
13 Magazine may have possession of the documents you are seeking.

14 **REQUEST FOR PRODUCTION NO. 47:**

15 If Your book *The Deep Rig: How Election Fraud Cost Donald J. Trump the*  
16 *White House, By a Man Who Did Not Vote for Him* refers to Plaintiff, a copy of  
17 said book.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 47:**

19 Objection. This request is burdensome and oppressive in that Plaintiff is  
20 demanding that Defendant purchase his book and provide him with a copy and  
21 when the book can be purchased online or at any major book store or internet sales  
22 outlet.

23 **REQUEST FOR PRODUCTION NO. 48:**

24 If Your book *Danger Close: Domestic Extremist Threat #1 Comes Clean*  
25 refers to Plaintiff, a copy of said book.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 48:**

27 Objection. This request is burdensome and oppressive in that Plaintiff is  
28 demanding that Defendant purchase his book and provide him with a copy and

1 when the book can be purchased online or at any major book store or internet sales  
2 outlet.

3 Dated: September 17, 2024

LAW OFFICES OF MICHAEL C. MURPHY

4  
5 By: /s/ Michael C. Murphy, Jr., Esq.

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7 Michael C. Murphy, Esq.  
8 Michael C. Murphy, Jr., Esq.  
9 Attorneys for Defendant,  
10 Patrick M. Byrne  
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LAW OFFICES OF MICHAEL C. MURPHY  
2625 Townsgate Road, Suite 330  
Westlake Village, CA 91361



**PROOF OF SERVICE**  
**UNITED STATES OF AMERICA**

I am employed and am a resident of the County of Ventura, State of California.

I am over the age of 18 and not a party to the within action. My business name and address is as follows:

Law Offices of Michael C. Murphy  
2625 Townsgate Road, Suite 330  
Westlake Village, CA 91361

On September 17, 2024, I served the foregoing document(s) on Opposing Counsel in this action described as follows:

**1. DEFENDANT PATRICK M. BYRNE'S FURTHER RESPONSES TO  
REQUESTS FOR PRODUCTION, SET ONE, FROM PLAINTIFF  
HUNTER BIDEN**

\_\_\_\_\_ by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list.

\_\_\_\_\_ by placing a copy of the original enclosed in sealed envelopes addressed as follows ("U.S. Mail"):

  X   by placing copies of the original through electronic transmission ("e-mail") to all parties appearing on the electronic service list as follows:

\_\_\_\_\_ by placing copies of the original through facsimile transmission ("fax") to all parties appearing on the service list as follows:

1 Paul B. Salvaty, Esq.  
2 Winston & Strawn LLP  
3 333 S. Grand Ave. 38th Floor  
4 Los Angeles, CA 90071-1543  
5 Tel: (213) 615-1700  
6 Fax: (213) 615-1750  
7 Email: [PSalvaty@winston.com](mailto:PSalvaty@winston.com)  
8 Email: [gaellis@winston.com](mailto:gaellis@winston.com)

9 Abbe David Lowell, Esq.  
10 1901 L St., N.W.  
11 Washington, D.C. 20036-3508  
12 Tel: (202) 282-5000  
13 Fax: (202) 282-5100  
14 Email:  
15 [AbbeLowellPublicOutreach@winston.com](mailto:AbbeLowellPublicOutreach@winston.com)

16 Bryan M. Sullivan, Esq.  
17 Zachary C. Hansen, Esq.  
18 Early Sullivan Wright Gizer & McRae, LLP  
19 6420 Wilshire Blvd., Suite 17th Fl.  
20 Los Angeles, CA 90048  
21 Tel: (323) 301-4660  
22 Fax: (323) 301-4676  
23 Email: [rclaudat@earllysullivan.com](mailto:rclaudat@earllysullivan.com)  
24 Email: [zhansen@earllysullivan.com](mailto:zhansen@earllysullivan.com)  
25 Email: [bsullivan@earllysullivan.com](mailto:bsullivan@earllysullivan.com)

**Attorneys for Plaintiff**  
**ROBERT HUNTER BIDEN**

26 The sender's name and email address are as follows:  
27 Name: Michael C. Murphy, Jr., Esq.  
28 Email: [Michael@murphlaw.net](mailto:Michael@murphlaw.net).

\_\_\_\_ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

X (Federal) I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.



1 Executed on September 17, 2024 at Westlake Village, California.  
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3

4 By: /s/ Michael C. Murphy, Esq.  
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